

BENTON J. CAMPBELL
UNITED STATES ATTORNEY

WILLIAM YOUNG (WY9160)
Special Assistant U.S. Attorney
271 Cadman Plaza East, 7th Floor
Brooklyn, NY 11201
Telephone: (718) 254-6057

ARLENE M. EMBREY (AE9718)
Trial Attorney
U.S. Small Business Administration
409 Third Street, S.W., Seventh Floor
Washington, D.C. 20416
Telephone: (202) 205-6976
Facsimile: (202) 481-0324

ORIGINAL

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SMALL BUSINESS
ADMINISTRATION AS RECEIVER FOR
COQUI CAPITAL PARTNERS, L.P.

Plaintiff,

v.

COQUI CAPITAL MANAGEMENT, LLC
et. al

Defendants.

Civil Action No. 08-0979
Judge Swain

Related Case No. 06-1564

MOTION TO ENTER APPEARANCE
PRO HAC VICE PURSUANT TO LOCAL RULE 1.3(C).

To the United States District Court for the Southern District of New York:

Comes now the undersigned, WILLIAM B. YOUNG, admitted to practice before this Court since 1989 presents this Motion for Ms. Arlene M. Embrey, Esq., Trial Attorney, Office of SBIC Enforcement, in the Office of General Counsel, United States Small Business

FILED
U.S. DISTRICT COURT
2008 FEB - 1 AM 10:59
S.D. OF N.Y.

USA

Administration, 409 3rd St., S.W., Washington, D.C. 20416 to enter her appearance *pro hac vice*, and in support thereof respectfully states:

1. That Ms. Embrey be admitted to practice before this Court pursuant to the Affidavits filed in support of this Motion, (attached hereto as Exhibit A and Exhibit B and incorporated herein by reference);

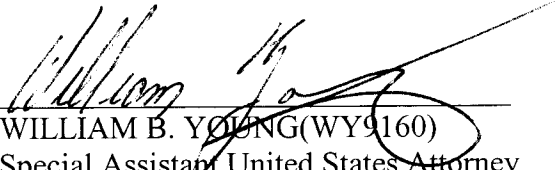
2. That Ms. Embrey is a member in good standing of the United States District Court for the Southern District of Florida and the Bar of the State of Florida, Bar No. 0125539, as evidenced by the certificate of good standing (attached hereto as Exhibit 1 to Exhibit B and incorporated herein by reference); and

3. That Ms. Embrey has previously been admitted to appear in this Court on a *pro hac vice* basis on six occasions, and is currently the attorney of record in the federal receivership action United States v. Coqui Capital Partners, LP, Case No. 06-CV-1564, currently pending before this Court and in United States v. Exeter Venture Lenders, LP, Case No.06-2856, before the Honorable Gerard Lynch.

WHEREFORE, William B. Young, a member in good standing of the Bar of the State of New York and admitted to practice in the United States District Court for the Southern District of New York, prays that this Motion to Enter Appearance Pro Hac Vice for Ms. Arlene M. Embrey, Esq. on behalf of Plaintiff, the United States Small Business Administration, in the referenced action be Granted.

DATED: February 1, 2008

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William B. Young", is written over a horizontal line.

WILLIAM B. YOUNG(WY9160)

Special Assistant United States Attorney

Office of the United States Attorney

271 Cadman Plaza East, 7th Floor

Brooklyn, NY 11201

Telephone: (718) 254-6057

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of February, 2008, I caused the foregoing Motion, Affidavits and Proposed Order for Admission Pro Hac Vice to be sent, via first class mail, postage pre-paid, to the following:

Coqui Capital Management, LLC
c/o Ike Kier
1775 Broadway, Suite 604
New York, NY 10019

Michael K. Wyatt, Esq.
Hogan & Hartson, LLP
555 Thirteenth Street, NW
Washington, DC 20004

Donald Zakarin, Esq.
Pryor, Cashman, Sherman, & Flynn
410 Park Avenue
New York, NY 10022-4441

A handwritten signature in black ink, appearing to read 'Donald Zakarin', is written over a horizontal line.

BENTON J. CAMPBELL
UNITED STATES ATTORNEY

WILLIAM YOUNG (WY9160)
Special Assistant U.S. Attorney
271 Cadman Plaza East, 7th Floor
Brooklyn, NY 11201
Telephone: (718) 254-6057

ORIGINAL

ARLENE M. EMBREY (AE9718)
Trial Attorney
U.S. Small Business Administration
409 Third Street, S.W., Seventh Floor
Washington, D.C. 20416
Telephone: (202) 205-6976
Facsimile: (202) 481-0324

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

_____)	
UNITED STATES SMALL BUSINESS)	
ADMINISTRATION AS RECEIVER FOR)	
COQUI CAPITAL PARTNERS, L.P.)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 08-0978
)	Judge Swain
COQUI CAPITAL MANAGEMENT, LLC)	
et. al)	Related Case No. 06-1564
)	
Defendants.)	
_____)	

**AFFIDAVIT OF WILLIAM B. YOUNG IN SUPPORT OF MOTION FOR
ADMISSION PRO HAC VICE**

The affiant, William B. Young, Esq., hereby swears and affirms:

1. I am a member in good standing of the bar of the State of New York and have been admitted to practice in the United States District Court for the Southern District of New York since 1989.

2. I am a Special Assistant United States Attorney and am associated with the Office of the United States attorney located at 271 Cadman Plaza East, 7th Floor Brooklyn, NY 11201

3. In my capacity as a Special Assistant United States Attorney, I have previously worked with Ms. Arlene M. Embrey, Esq., who is employed as an attorney by the United States Small Business Administration, 409 3rd Street, S.W., Washington, D.C. 20416.

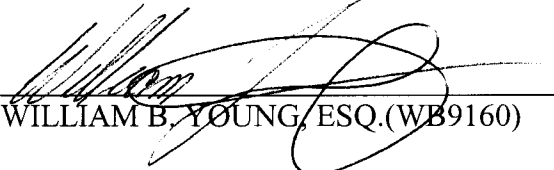
4. It is my opinion that Ms. Embrey's work product, as it has been produced to me, has been exemplary.

5. Ms. Embrey has been admitted to practice in this Court on a *pro hac vice* basis at least five times, and is currently the attorney of record in the federal receivership action United States v. Coqui Capital Partners, LP, Case No. 06-CV-1564, currently pending before this Court and in United States v. Exeter Venture Lenders, LP, Case No.06-2856, before the Honorable Gerard Lynch.

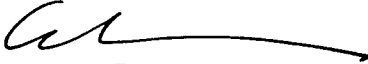
6. It is my belief that Ms. Embrey has read and is familiar with the federal, local and individual rules of practice of this Court, and is prepared to faithfully adhere to such rules in connection with any activities in this Court.

7. I recommend that Ms. Embrey be admitted in this Court to argue and try the above referenced matter as counsel of record.

Executed on this 1st day of February, 2008.


WILLIAM B. YOUNG, ESQ.(WB9160)

Subscribed and sworn to me on this
1st day of February, 2008


CELESTE F. KAPTUR
Notary Public, State of New York
No. 01KA6070929
Qualified in Westchester County
Commission Expires March 11, 2010

Notary Public

My Commission Expires: 3-11-2010

ORIGINAL

BENTON J. CAMPBELL
UNITED STATES ATTORNEY

WILLIAM YOUNG (WY9160)
Special Assistant U.S. Attorney
271 Cadman Plaza East, 7th Floor
Brooklyn, NY 11201
Telephone: (718) 254-6057

ARLENE M. EMBREY (AE9718)
Trial Attorney
U.S. Small Business Administration
409 Third Street, S.W., Seventh Floor
Washington, D.C. 20416
Telephone: (202) 205-6976
Facsimile: (202) 481-0324

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SMALL BUSINESS
ADMINISTRATION AS RECEIVER FOR
COQUI CAPITAL PARTNERS, L.P.

Plaintiff,

v.

COQUI CAPITAL MANAGEMENT, LLC
et. al

Defendants.

Civil Action No. 08-0978
Judge Swain

Related Case No. 06-1564

**AFFIDAVIT OF ARLENE M. EMBREY IN SUPPORT OF MOTION FOR
ADMISSION PRO HAC VICE**

The affiant, Arlene M Embrey, Esq., hereby swears and affirms:

1. I am currently, and since 1997 have been, a member in good standing of the bar of the State of Florida and have been admitted to practice in the United States District

Court for the Southern District of Florida. A certificate of good standing is attached hereto as Exhibit 1. I have never been disbarred or faced disciplinary action.

2. I am an attorney with the Office of General Counsel, United States Small Business Administration (“SBA”), 409 3rd Street, S.W., Washington, D.C. 20416 and have been employed there since 1998.

3. In my capacity as an attorney with SBA, I am responsible for, and am the attorney of record for, at least 18 (eighteen) federal receivership actions.

4. I have been admitted to practice in this Court on a *pro hac vice* basis on five occasions and am currently the attorney of record in the federal receivership action United States v. Coqui Capital Partners, LP, Case No. 06-CV-1564, currently pending before this Court, and in United States v. Exeter Venture Lenders, LP, Case No.06-2856, before the Honorable Gerard Lynch.

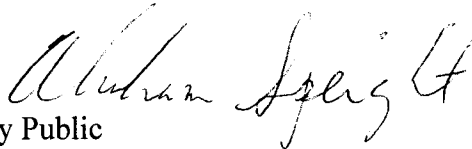
5. I have read and am familiar with the federal, local and individual rules of practice of this Court, and will faithfully adhere to such rules in connection with any activities in this Court.

6. I respectfully request that I be admitted in this Court to argue and try the above referenced matter as counsel of record.

Executed on this 30th day of January, 2008.


ARLENE M. EMBREY, ESQ.(AME 9718)

Subscribed and sworn to me on this
30th day of January, 2008.


Notary Public
My Commission Expires: _____

Abraham A. Speight
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires April 30, 2008



The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600
WWW.FLORIDABAR.ORG

State of Florida)

County of Leon)

In Re: 125539
Arlene M. Embrey
United States Small Business
Administration
409 3rd Street S.W., 7th Floor
Washington, DC

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on October 20, 1997.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 17th day of January, 2008.

A handwritten signature in black ink that reads "Willie Mae Shepherd". The signature is fluid and cursive.

Willie Mae Shepherd
Supervisor, Membership Records
The Florida Bar

WMS/smwx2/R10

BENTON J. CAMPBELL
UNITED STATES ATTORNEY

ORIGINAL

WILLIAM YOUNG (WY9160)
Special Assistant U.S. Attorney
271 Cadman Plaza East, 7th Floor
Brooklyn, NY 11201
Telephone: (718) 254-6057

ARLENE M. EMBREY (AE9718)
Trial Attorney
U.S. Small Business Administration
409 Third Street, S.W., Seventh Floor
Washington, D.C. 20416
Telephone: (202) 205-6976
Facsimile: (202) 481-0324

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SMALL BUSINESS
ADMINISTRATION AS RECEIVER FOR
COQUI CAPITAL PARTNERS, L.P.

Plaintiff,

v.

COQUI CAPITAL MANAGEMENT, LLC
et. al

Defendants.

Civil Action No. 08-0978

Judge Swain

Related Case No. 06-1564

**ORDER APPROVING MOTION TO ENTER APPEARANCE
PRO HAC VICE PURSUANT TO LOCAL RULE 1.3(C).**

Having considered the Motion of William B. Young, Esq. praying that Ms. Arlene M. Embrey, Esq., appear in this action *pro hac vice* on behalf of Plaintiff, the United States Small Business Administration as Receiver for Coqui Capital Partners, LP, in the referenced action; the

Court finding that the Motion is meritorious; and the Court being otherwise advised in the premises:

It is ORDERED that the Motion of William B. Young on behalf of Arlene M. Embrey to appear in this action on behalf of Plaintiff pro hac vice is hereby GRANTED.

Dated this ____ day of _____, 2008, at New York, New York.

THE HONORABLE LAURA SWAIN
UNITED STATES DISTRICT COURT JUDGE